



MAR 28 2013

Mr. Timothy Luing,
President
Dover Business College
600 Getty Ave
Clifton, NJ 07011

Certified Mail
Return Receipt Requested
Domestic Return Receipt
7006 2760 0002 1694 1038

RE: **Final Program Review Determination**
OPE ID: 012346
PRCN: 201120227470

Dear Mr. Luing:

The U.S. Department of Education's (Department's) School Participation Team – NY/Boston issued a program review report on March 23, 2012 covering Dover Business College's (Dover) administration of programs authorized by Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2009/2010 and 2010/2011 award years. Dover's final response was received on August 30, 2012. A copy of the program review report (and related attachments) and Dover's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by Dover upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

Purpose:

Final determinations have been made concerning all of the outstanding findings of the program review report. The purpose of this letter is to: (1) identify liabilities resulting from the findings of this program review report, (2) provide instructions for payment of liabilities to the Department, (3) notify the institution of its right to appeal.

The total liabilities due from the institution from this program review are **\$27,175.79**.

This final program review determination contains detailed information about the liability determination for all findings.

Protection of Personally Identifiable Information (PII):

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals

and may lead to identity theft or other fraudulent use of the information. To protect PII, the findings in the attached report does not contain any student PII. Instead, each finding references students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Student Sample.

Appeal Procedures:

This constitutes the Department's FPRD with respect to the liabilities identified from the March 23, 2012 program review report. If Dover wishes to appeal to the Secretary for a review of monetary liabilities established by the FPRD, the institution must file a written request for an administrative hearing. The Department must receive the request no later than 45 days from the date Dover receives this FPRD. An original and four copies of the information Dover submits must be attached to the request. The request for an appeal must be sent to:

Ms. Mary E. Gust, Director
Administrative Actions and Appeals Service Group
U.S. Department of Education
Federal Student Aid/PC
830 First Street, NE - UCP3, Room 84F2
Washington, DC 20002-8019

Dover's appeal request must:

- (1) indicate the findings, issues and facts being disputed;
- (2) state the institution's position, together with pertinent facts and reasons supporting its position;
- (3) include all documentation it believes the Department should consider in support of the appeal. An institution may provide detailed liability information from a complete file review to appeal a projected liability amount. Any documents relative to the appeal that include PII data must be redacted except the student's name and last four digits of his / her social security number (please see the attached document, "Protection of Personally Identifiable Information," for instructions on how to mail "hard copy" records containing PII); and
- (4) include a copy of the FPRD. The program review control number (PRCN) must also accompany the request for review.

If the appeal request is complete and timely, the Department will schedule an administrative hearing in accordance with § 487(b)(2) of the HEA, 20 U.S.C. § 1094(b)(2). The procedures followed with respect to Dover's appeal will be those provided in 34 C.F.R. Part 668, Subpart H. **Interest on the appealed liabilities shall continue to accrue at the applicable value of funds rate, as established by the United States Department of Treasury, or if the liabilities are for refunds, at the interest rate set forth in the loan promissory note(s).**

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. §§ 668.24(e)(1), (e)(2), and (e)(3).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact Teresa Martinez at 646-428-3748. Questions relating to any appeal of the FPRD should be directed to the address noted in the Appeal Procedures section of this letter.

Sincerely,

(b)(6)

Betty Coughlin
Division Director

Enclosure:

Protection of Personally Identifiable Information

cc: Keith Babich, Financial Aid Administrator
Accrediting Council for Independent Colleges and Schools (ACICS)
NJ Department of Education, State of New Jersey
NJ Department of Labor and Workforce Development

bcc: Reading file, Correspondence file, Tera Martinez, Chris Curry,
OCFO Accounts Receivable, Bob James, FSA PC SEC (ICD-DL-TECH-FFEL Liabilities),
FSA PC SEC (ICD-All Title IV Programs Liabilities), Kathleen Wicks, ERM

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

PII being submitted electronically or on media (e.g., CD-ROM, floppy disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip (Version 9.0) and are encrypted with AES encryption. Zipped files using WinZip must be saved as Legacy compression (Zip 2.0 compatible).

The Department must receive an access password to view the encrypted information. The password must be e-mailed separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).

Hard copy files and media containing PII must be:

- sent via a shipping method that can be tracked with signature required upon delivery
- double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
- labeled with both the "To" and "From" addresses on both the inner and outer packages
- identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender).

PII data cannot be sent via fax.

Prepared for
Dover Business College



START HERE
GO FURTHER
FEDERAL STUDENT AID

OPE ID 012346
PRCN 201120227470

Prepared by:
U.S. Department of Education
Federal Student Aid
School Participation Team - NY/Boston

Final Program Review Determination

MAR 28 2013

Table of Contents

	Page
A. Institutional Information.....	3
B. Scope of Review.....	4
C. Findings and Final Determinations.....	4
<i>Resolved Findings</i>	4
Finding 4 Exit Counseling Not Documented/Performed	
Finding 5 Written Policies and Procedures Missing/Inadequate – FWS	
Job Descriptions	
Finding 6 Reporting Requirements – School Failed to Update EAPP	
<i>Findings with Final Determinations</i>	5
Finding 1 Program Not Offered as Approved – Improper Accounting	5
of Clock Hours	
Finding 2 Credit Balances	9
Finding 3 Incomplete Verification	11
D. Summary of Liabilities	14
E. Payment Instructions	15
F. <u>Appendices</u>	

Appendix A: Student Level Detail

Appendix B: Student Level Detail – Findings 1 & 3

Appendix C: Institution's Written Response

Appendix D: Estimated Actual Loss Calculation

Appendix E: Cost of Funds – Findings 1 & 3

Appendix F: Unduplicated Liabilities 2010/2011

Appendix G: 3/23/12 Program Review Report

A. Institutional Information

Dover Business College
600 Getty Ave
Clifton, NJ 07011

Type: Proprietary

Highest Level of Offering: Non-Degree 1 Year (900-1799 hours)

Accrediting Agency: Accrediting Council for Independent Colleges and Schools
(ACICS)

Current Student Enrollment: 671 (2010)

% of Students Receiving Title IV: 90% (2010)

Title IV Participation – source: Common Origination and Disbursement (COD)

	<u>2011-2012</u>
Federal Pell Grant (Pell Grant)	\$4,020,621
Federal Direct Loan (DL)	\$9,803,862

	<u>2010-2011</u>
Federal Pell Grant (Pell Grant)	\$4,800,698
Federal Direct Loan (DL)	\$9,781,639

	<u>2009-2010</u>
Federal Pell Grant (Pell Grant)	\$3,663,297
Federal Direct Loan (DL)	\$7,555,139

Default Rate FFEL/DL:	2010	15.4%
	2009	12.7%
	2008	16.7%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Dover Business College (Dover) from March 21, 2011 to March 30, 2011. The review was conducted by Teresa Martinez, Brenec Johnson and Ebony Foy.

The focus of the review was to determine Dover's compliance with the statutes and federal regulations as they pertain to the institution's administration of Title IV programs. The review consisted of, but was not limited to, an examination of Dover's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files was identified for review from the 2009/2010 and 2010/2011 award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. An additional 21 files were selected for further review of Dover's administration of the Title IV programs. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning Dover's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve Dover of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs. A program review report was issued on March 23, 2012.

C. Findings and Final Determinations

Resolved Findings

Findings 4, 5, and 6

Dover has taken the corrective actions necessary to resolve findings 4, 5, and 6 of the program review report. Therefore, these findings may be considered closed. Dover's written response related to these resolved findings are found in Appendix C. Findings requiring further action by Dover are discussed below.

Findings with Final Determinations

The program review report findings requiring further action are summarized below. At the conclusion of each finding is a summary of Dover's response to the finding, and the Department's final determination for that finding. A copy of the program review report issued on March 23, 2012 is attached as Appendix G.

Note: Any additional costs to the Department, including interest, special allowances, cost of funds, unearned administrative cost allowance, etc., are not included in individual findings, but instead are included in the summary of liabilities table in Section D of the report.

1. Program Not Offered as Approved – Total Program Hours Not Offered

Citation Summary: *An institution offering programs in credit hours is subject to a specific clock to credit hour conversion formula to determine the number of credit hours allowed for purposes of Title IV HEA program assistance. Prior to 7/1/11, this formula requires that a quarter hour must include at least 20 clock hours of instruction. A clock hour is a 50- to 60-minute class, (or lecture, recitation, faculty supervised laboratory, shop training, etc.) in a 60-minute period. Dover's programs do not meet any exception to this conversion requirement. 34 C.F.R. §600.2; 34 C.F.R. §668.8 (k) and (l); 34 C.F.R. §668.9.*

34 CFR § 690.63(b) specifies that the Pell Grant calculation for a payment period for a student in a program using credit hours with standard terms requires prorations of the award for each payment period. The calculation for the payment period prorates a student's scheduled award based on enrollment status and then determining his or her annual award from the payment schedule for full time students or the disbursement schedule for three-quarter time, half time, or less-than half-time students.

Noncompliance Summary: *The reviewers found that Dover did not always offer all hours of instruction as stated in catalogs and program approvals, which could then affect the number of credit hours offered in the students' programs. The following are some examples of shortened program hours offered:*

Student 2 *enrolled in the Medical Assistant program, which started on 7/06/09. According to her enrollment agreement that program offered a total of 1144 clock hours/56 quarter credit hours over 48 weeks. Dover's accreditor and state licensing agency approve the program for 1144 clock hours/56 quarter credit hours. Dover's catalog describes this program as containing 57 quarter credit hours and 1144 clock hours.*

A review of the official class schedule, transcript and the actual attendance records show that Dover did not offer all the specified hours of instruction. The official class schedule

and attendance records confirmed that classes ended on 6/23/10, offering a total of 47 weeks, excluding the week at Christmas when no classes were held. However, there were five holidays that fell in that period; Labor Day, Thanksgiving, Martin Luther King Day, President's Day and Memorial Day. A review of the official class schedule, and the actual attendance records do not show that any additional classes were offered to offset these holidays. Additionally, a detailed review of the official class schedule and the attendance records confirms the student was offered 903 hours of classroom instruction for the Medical Assistant program instead of the 1144 hours specified in the school's catalog and approvals.

Summer 2009 Qtr.

7/6/09 – 9/18/09

11 Wks

<i>Offered</i>	<i>Quarter</i>	<i>Required Credit</i>	<i>Documented Hours</i>	
<u>Course</u>	<u>Credits</u>	<u>Conversion</u>	<u>Attendance</u>	
<u>Transcript</u>				
CIS 101 - 7 Hrs per wk.	2	40 Clock Hrs	76	76
GEN 106 - 4 Hrs per wk.	4	80 Clock Hrs	44	44
GEN 131 - 6 Hrs per wk.	4	80 Clock Hrs	66	66
MED 101 - 3 Hrs per wk.	3	60 Clock Hrs	33	33
MED 108 - 4 Hrs per wk.	2	40 Clock Hrs	44	42

Fall 2009 Qtr.

9/28/09 – 12/18/09

12 Wks

GEN 132 - 6 Hrs per wk.	4	80 Clock Hrs	63	72
MED 102 - 3 Hrs per wk	3	60 Clock Hrs	36	36
MED 105 – 1 Hr per wk	1	20 Clock Hrs	13	12
MED 110 – 8 Hrs per wk	4	80 Clock Hrs	96	96
MED 115 - 4 Hrs per wk.	2	40 Clock Hrs	48	44
MED 120 – 2 Hrs per wk.	1	20 Clock Hrs	24	24

Winter 2010 Qtr.

1/4/10 – 3/26/10

12 Wks

BUS 190 - 1 Hr per wk	1	20 Clock Hrs	8	12
MED 125 - 3 Hrs per wk	2	40 Clock Hrs	36	36
MED 130 - 4 Hrs per wk.	2	40 Clock Hrs	46	48
MED 132 - 4 Hrs per wk.	2	40 Clock Hrs	44	40
MED 134 – 1 Hr per wk.	1	20 Clock Hrs	16	16
MED 142 - 8 Hrs per wk	6	120 Clock Hrs	96	96

MED 146 - 2 Hrs per wk. 1 20 Clock Hrs 22 24

Spring 2010 Qtr.

4/5/10 – 6/26/10

12 Wks

GEN 111 - 4 Hrs per wk. 3 60 Clock Hrs 48 48

MED 191 - 4 Hrs per wk. 5 100 Clock Hrs 44 48

Total 53 1060 903 913

Based on the school catalog, it appears that Dover intended to offer a 1144 hour program but instead offered only 903 hours. The number of clock hours offered within the specific classes varied between what was actually offered per the attendance records and the student's official class schedule. In addition, Dover did not offer the Psychology course (GEN 110) as listed in the catalog. Adding the 4 scheduled credit hours, the total number of credit hours offered would be 57, instead of 53. In addition, since the number of clock hours in the program was not properly calculated, the number of credit hours calculated are fewer than the number of credit hours approved for the program on the ECAR. In the case of **student no. 2**, after applying the clock-to-credit hour conversion formula to **903** hours, the result is **45** quarter credit hours allowed for purposes of Title IV HEA program assistance. Therefore, Dover only offered 84% of the Medical Assistant program (45 quarter credit hours/53 quarter credit hours).

Additional students who graduated from Dover's programs with less than the approved number of class hours offered were as follows:

Student #	Program	Required Qtr. Credit Hours	Offered Qtr. Credit Hours	% of Program Offered
1	Patient Care	37	29	78
2	Medical Assistant	57	45	78
4	Medical Assistant	57	53	92
5	Patient Care	37	28	75
7	Surgical Processing Tech.	44	33	75
8	Medical Assistant	57	49	85
9	Medical Insurance & Coding	56	48	85
10	Surgical Technologist	71	39	54
11	Patient Care	37	30	81
12	Medical Insurance & Coding	56	29	51
13	Patient Care	37	30	81

22	Practical Nurse	70	41	58
23	Medical Assistant	57	49	85
27	Medical Insurance & Coding	56	40	71
36	Patient Care	37	28	75

An institution's failure to offer the complete academic program as documented in its catalog, and as approved by its accrediting and licensing bodies, may impact the amount of Title IV funds that a student is eligible to receive.

Required Action Summary: *Given the numerous instances of hours in question detailed in the above chart, Dover was required to confirm the actual number of clock hours/quarter credit hours offered in all its programs for all Title IV recipients in the period covered by this program review, to confirm whether students received the appropriate amount of Title IV funds for the programs that were offered.*

Dover was required to recalculate students' Title IV eligibility in all cases where they did not receive the specified number of hours in the programs, and report any resultant overawards, by Title IV program, in the following format:

Award Year

Student Name

Last four digits of the student's Social Security Number

Original Program Length (Clock/Quarter Credit Hours)

Revised Program Length (Clock/Quarter Credit Hours)

Title IV overaward/liability (by program)

*Dover was required to determine the effect of the reduced number of program hours on student eligibility for Title IV aid awarded and disbursed to the students in this finding. Amounts paid in excess of allowable amounts must be identified for each of these students by reducing the aid for the program by the percentage of hours that were not offered to the students during the award years 2009/10 and 2010/11. In the case of **Student 18**, who was awarded a Pell award of \$2,800, a Direct Stafford Subsidized loan of \$7,774 and a Direct Stafford UnSubsidized loan of \$9,640, the institution would be liable for 29% of the awarded amounts.*

All required information for this report was required to have been attested to by a Certified Public Accountant. We define auditor attestation as a confirmation statement that a corrective action was accurately taken by the Institution in accordance with the Department's instructions (which includes the confirmation of documents, liabilities paid, file reviews, projection sampling, and formulas used to calculate liabilities).

Dover's Response: Dover, as part of its August 16, 2012 response, provided a spreadsheet detailing the effect of the reduced number of program hours on students' eligibility for Title

IV aid awarded and disbursed to students during the award years 2009/10 and 2010/11. The file review identified **\$24,416.75** paid in excess of allowable amounts. This response included auditor attestation.

Final Determination: The Pell grant principal and interest due to the Department for this finding is **\$12,098.27**. Details of the liability for this finding can be found in Appendix E. The liabilities for this finding may have been duplicated in other findings in this determination; therefore, any duplicated liabilities will be removed in the summary of liabilities table.

Estimated Actual Loss (EAL)

In lieu of requiring the institution to assume the risk of default by purchasing the ineligible loans from the holder, the Department has asserted a liability not for the loan amount, but rather for the estimated actual or potential loss that the government may incur with respect to the ineligible loan or loan amount. The estimated actual loss to the Department that has resulted or will result from those ineligible loans is based on Dover's most recent cohort default rate available.

2. Late or Unmade Payments of Credit Balances to Students

Citation: *Whenever an institution disburses Title IV, HEA program funds by crediting a student's account and the total amount of all Title IV, HEA funds credited exceeds the amount of institutional charges, the institution must pay the resulting credit balance directly to the student or parent as soon as possible but no later than 14 days after the balance occurred if the credit balance occurred after the first day of class of a payment period, or no later than 14 days after the first day of class of a payment period if the credit balance occurred on or before the first day of class of that payment period. 34 C.F.R. §668.164 (e)(1)(2), 34 C.F.R. §668.164 (d)(2).*

Noncompliance: *Dover failed to make timely payments of credit balances to students when the institution received Title IV funds in excess of their tuition and fee charges. Those students had not given permission to Dover to hold those funds on their accounts. Further, Title IV requirements prohibit using Title IV funds for future or past payment periods, with the exception of balances of no more than \$200.*

*For example, **Student 2** received an Unsubsidized Direct Loan disbursement on September 29, 2009, which created a credit balance of \$22.00, which was then due the student no later than October 13, 2009. There was no indication on the student's account record that the credit balance had been paid. The student graduated on June 25, 2010.*

***Student 10** received a Subsidized Direct Loan disbursement on May 5, 2009, which created a credit balance of \$937.52. On May 6, 2009, the student received a Federal Pell Grant disbursement increasing the credit balance due the student to \$2,497. The credit balance was due the student no later than May 20, 2009. The credit balance was never delivered to the student but applied to the student's subsequent term tuition on July 27, 2009.*

***Student 15** received a Supplemental Educational Opportunity Grant disbursement on April, 21, 2010, which created a credit balance of \$417, due the student no later than May 5, 2010. The student received an additional Supplemental Educational Opportunity Grant disbursement on June 14, 2010 creating an additional credit balance of \$417. There was no indication on the student's account record that the credit balances had been paid. The student was dropped from the Medical Assistant program on 1/12/11.*

***Student 27** received Federal Pell Grant disbursements on February 16 and 17, 2010, which created a credit balance of \$379, due the student no later than March 3, 2010. There was no indication on the student's account record that the credit balance had been paid. The student graduated on December 17, 2010.*

*In addition, the following students also had credit balances at the time of the review:
Student 1, 4, 7, 11, 12, 13, 14, 22, 28, 47 and 50.*

Required Action: *In response to this finding, Dover was required to review all accounts of students who attended between 7/1/09 through 6/30/11 to identify students whose accounts have credit balances that should have been paid. **Any students for whom credit balances should have been paid, but were not, was required to be paid immediately.** A listing of those students and the credit balance amounts issued was to be provided with the response to this report. Further, Dover was required to provide this office with copies of the canceled checks, front and back, representing those payments when they are received from the bank.*

Dover was required to develop procedures that will ensure the prompt delivery of credit balances to students in the future. Details of those procedures was to be provided with the response to this report.

Dover's Response: Dover, as part of its August 16, 2012 response, performed a full file review of all students in attendance between 7/1/09 and 6/30/11. The file review identified \$163,236.92 as the total amount of Title IV credit balances that should have been paid. Dover indicated that the refunds have been paid and the required back up documentation would be provided at a later date.

Final Determination:

In response to this report, Dover must provide proof (copy of the canceled checks, front and back) that payment was made to the students identified in the file review within 45 days of receipt of this letter, to the following address:

Teresa Martinez
US Department of Education
32 Old Slip, Financial Square
New York, NY 10005

If Dover has lost contact with a student who is due a Title IV, HEA credit balance, it must use all reasonable means to locate the student. If funds are due to the student and/or parent and those funds have not been negotiated, the institution has a fiduciary responsibility to monitor and take appropriate action on the disposition of the funds. If the student/parent does not receive or negotiate any direct disbursement or credit balance payment, the following applies:

- For non-negotiated checks, the institution must restore the funds to the applicable FSA programs no later than 240 days after the date the check is issued;
- For returned checks or rejected EFT, the institution must return the funds no later than 45 days after the return/reject, unless it makes additional attempts to disburse within 45 days.

Dover has indicated that they are working with the Department's finance office to properly make the required payments to the students identified in the file review. Dover must keep the Department apprised of payments made to the students and any funds returned to the applicable FSA programs.

3. Incomplete Verification

Citation: *An institution is responsible for verifying all required information submitted by applicants for student financial assistance in connection with the calculation of their expected family contributions (EFC) for Title IV assistance. 34 C.F.R. §668.51(a),(b), 34 C.F.R. §668.56 (a) and C.F.R. 34 §668.57 (a),(b),(c),(d). An institution is responsible for updating information and resolving conflicting information under 34 C.F.R. §668.55(a)(1)(i)(ii) and using corrections to data originally reported to determine whether student eligibility would be impacted, 34 C.F.R. 668.59 (a),(b),(c),(d),(e). Title IV aid disbursements without complete or proper verification are institutional liabilities to the Federal aid programs.*

Noncompliance: *Dover did not accurately verify information from students who were selected for verification.*

Student 12's application for financial aid was selected for verification in the 2009-2010 award year. The student's 2008 Income Tax Return was not signed.

Student 44's application for financial aid was selected for verification in the 2010-2011 award year. The number in college reported on the student's ISIR was two, however the verification worksheet only showed the student attending college. In addition, the student's 2009 Income Tax Return was not signed.

Student 46's application for financial aid was selected for verification in the 2010-2011 award year. The number in college reported on the student's ISIR was two, however the verification worksheet only showed the student attending college.

Student 49's application for financial aid was selected for verification in the 2010-2011 award year. The number in household reported on the student's ISIR was three, however the verification worksheet only showed the student as living in the household. In addition, a note in the student's file indicated that the student's children did not live with him.

Required Action: *In response to this report, Dover was required to review the files of all Title IV recipients who were selected for verification in the 2010/2011 award years. By collecting any missing documentation and performing all required need analyses to confirm students' eligibility if information was revised as a result of verification. Dover is liable for the amounts of any awards in excess of students' revised need. Additionally, the institution is liable for all Title IV funds awarded in the applicable award year if the required documentation could not be collected. Please note, in cases where information on verification worksheets was revised, the changes were to be initialed and the worksheets signed again by the required persons.*

In response to this finding, Dover was required to report the total amount of ineligible Title IV funds disbursed to students. All liabilities were to be reported by award year, listing students in alphabetical order and spreadsheet format with the following column headings:

*Award Year
Student's Name
Last four digits of the student's Social Security Number
Original Award (by Title IV Program)
Revised Award (by Title IV Program)
Difference (by Title IV Program)*

The result of Dover's file review was required to have been attested to by a Certified Public Accountant. We define auditor attestation as a confirmation statement that a corrective action was accurately taken by the Institution in accordance with the Department's instructions (which includes the confirmation of documents, liabilities paid, file reviews, projection sampling, and formulas used to calculate liabilities).

Dover's Response: Dover, as part of its August 16, 2012 response, performed a full file review of all students selected for verification during the 2010-2011 award year. The file review identified **\$14,219** as the total amount of Title IV aid over awarded. This response included auditor attestation.

Final Determination: The Pell grant principal and interest due to the Department for this finding is **\$14,387.29**. Details of the liability for this finding can be found in Appendix E. The liabilities for this finding may have been duplicated in other findings in this determination; therefore, any duplicated liabilities will be removed in the summary of liabilities table.

D. Summary of Liabilities

The total amount calculated as liabilities from the findings in the program review determination is as follows. The liability amount in the first chart below reflects duplicated liabilities because some students appear in more than one finding. This information is provided so that the institution understands the liabilities associated with each finding. Duplicate liabilities have been removed in the second chart. The payment instructions in Section E have been adjusted to reflect the unduplicated liabilities. Appendix E contains a detailed accounting of the interest liabilities identified below for the costs the Department incurred as a result of ineligible disbursements and late or unmade returns.

The total amount of Federal Direct Loans that Dover improperly disbursed during the 2009/2010, and 2010/2011 award years for findings 1 is **\$12,460.04**. The total estimated actual loss that Dover must pay to the Department for the ineligible loans is **\$715.71**. A copy of the results of that calculation is included as Appendix D.

Actual Liabilities By Finding – Including Duplicate Liabilities

Initial Liabilities	Pell (Closed Award Years)	DL/FFEL	EALF FFEL	
Finding 1	\$11,956.71	\$12,460.04		
Finding 3	\$14,219.00			
Total	\$26,175.71	\$12,460.04		

Duplicate Liabilities Removed

Initial Liabilities	Pell (Closed Award Year)	DL / FFEL	EALF FFEL	
Finding 1 & 3	\$26,150.23		\$715.71	
Subtotal 1	\$26,150.23			
Interest/SA	\$309.85			
Subtotal 2				
TOTAL	\$26,460.08			
Payable To:				Totals
Department	\$26,460.08		\$715.71	\$27,175.79

E. Payment Instructions

1. Liabilities Owed to the Department

Liabilities Owed to the Department \$1,000 or More but Less Than \$100,000

Dover owes to the Department **\$27,175.79**. Payment must be made by forwarding a check made payable to the "U.S. Department of Education" to the following address within 45 days of the date of this letter:

U.S. Department of Education
P.O. Box 979026
St. Louis, MO 63197-9000

Remit checks only. Do not send correspondence to this address.

Payment must be made via check and sent to the above Post Office Box. Payment and/or adjustments made via G5 will not be accepted as payment of this liability. Instead, the school must first make any required adjustments in COD as required by the applicable finding(s) and Section II – Instructions by Title IV, HEA Program (below), remit payment, and upon receipt of payment the Department will apply the funds to the appropriate G5 award (if necessary).

The following identification data must be provided with the payment:

Amount:	\$27,175.79
DUNS:	015601441
TIN:	223745869
PRCN:	201120227470

2. Terms of Payment

As a result of this final determination, the Department has created a receivable for this liability and payment must be received by the Department within **45 days of the date of this letter**. If payment is not received within the 45-day period, interest will accrue in monthly increments from the date of this determination, on the amounts owed to the Department, at the current value of funds rate in effect as established by the Treasury Department, until the date of receipt of the payment. Dover is also responsible for repaying any interest that accrues. If you have any questions regarding interest accruals or payment credits, contact the Department's Accounts Receivable Group at (202) 245-8080 and ask to speak to a Dover account representative.

If full payment cannot be made within **45** days of the date of this letter, contact the Department's Accounts Receivable Group to apply for a payment plan. Interest charges and other conditions apply. Written request may be sent to:

U.S. Department of Education
OCFO Financial Management Operations
Accounts Receivable Group
550 12th Street, S.W., Room 6111
Washington, DC 20202-4461
Attn: Nancy L. Hoglund

If within 45 days of the date of this letter, Dover has neither made payment in accordance with these instructions nor entered into an arrangement to repay the liability under terms satisfactory to the Department, the Department intends to collect the amount due and payable by administrative offset against payments due Dover from the Federal Government. **Dover may object to the collection by offset only by challenging the existence or amount of the debt.** To challenge the debt, Dover must **timely appeal** this determination under the procedures described in the "Appeal Procedures" section of the cover letter. The Department will use those procedures to consider any objection to offset. **No separate appeal opportunity will be provided.** If a timely appeal is filed, the Department will defer offset until completion of the appeal, unless the Department determines that offset is necessary as provided at 34 C.F.R. § 30.28. This debt may also be referred to the Department of the Treasury for further action as authorized by the Debt Collection Improvement Act of 1996.

3. Liabilities Owed to the Department in the case of Title IV Grants

Findings: 1 & 3

Appendices: Appendix B

Camden must repay:

Pell Closed Award Years			
Amount (Principal)	Amount (Interest)	Title IV Grant	Award Year
\$2,488.15	\$29.44	Pell	2009/2010
\$23,662.08	\$280.41	Pell	2010/2011
Total Principal	Total Interest		
\$26,150.23	\$309.85		

The disbursement record for each student identified in the appendices to the applicable findings must be adjusted in the Common Origination and Disbursement (COD) system based on the recalculated amount (principal) identified in the appendices.

Adjustments in COD must be completed prior to remitting payment to the Department. **Payment cannot be accepted via G5. Once the Department receives payment via Check, the Department will apply the principal payment to the applicable G5 award. Interest will be applied to the general program account.**

A copy of the adjustment to each student's COD record must be sent to Teresa Martinez **within 45 days of the date of this letter.**

4. FFEL - Estimated Loss

Finding: 1

Appendix: Appendix D

FFEL – Estimated Actual Loss	
Amount	Award Year
\$51.16	2009/2010
\$664.55	2010/2011
Total	
\$715.71	

Dover must pay the amount above in FFEL estimated actual loss liabilities for the award year(s) reflected above. The liabilities will be applied to the general Direct Loan fund. This amount is also reflected in the total amount owed to the Department in Section 1 above.

Appendix A

AWARD YEAR 2009-2010

No.	Last Name	First Name	SSN
(b)(6); (b)(7)(C)			

AWARD YEAR 2009-2010

Expanded Sample for Federal Work Study

No.	Last Name	First Name	SSN
-----	-----------	------------	-----

(b)(6); (b)(7)(C)

dy

(b)(6); (b)(7)(C)

Appendix B - Dover Student List – Findings 1 & 3

Student Number	Student Name
(b)(6); (b)(7)(C)	

(b)(6); (b)(7)(C)

[illegible]

(b)(6); (b)(7)(C)

[illegible]

(b)(6); (b)(7)(C)

[illegible]

(b)(6); (b)(7)(C)

[illegible]

(b)(6); (b)(7)(C)

[illegible][illegible]

Appendix C



Clifton:
600 Gerty Avenue
Clifton, NJ 07011
973.546.0123 fax: 973.546.0017

Dover:
15 East Blackwell Street
Dover, NJ 07801
973.366.6700 fax: 973.366.6329

August 16, 2012

Theresa Martinez
U.S Department of Education
Federal Student Aid
Financial Square
32 Old Slip, 25th Floor
New York, NY 10005

Program Review Report
OPE ID: 012346
PRCN: 201120227470

Dear Ms. Martinez,

Dover Business College is deeply appreciative of the time your team spent with us on campus during the Program review and of the time required to prepare the Program Review Report.

We realize these are very busy times and appreciate the patience extended to us as we worked to complete the requested projects documented in this submission.

Please know that Dover Business College carefully reviewed the Program Review Report prepared by the New York School Participation Team.

Dover Business College thanks the team for identifying areas of improvement for the college and for helping us to become the best we can be in areas related to the administration of Federal Financial Aid Funds.

As a result of the file reviews requested by Program Review Report, Dover Business College has identified a total of \$200,593.67 in discrepant funds. This total is detailed and explained in the attached binder.

Here is a brief breakdown:

Finding #1 File Review: \$24,416.75
Finding #2 File Review: \$163,236.92
Finding#3 File Review: \$12,940

As you review our submission, please let me know if I can be of any assistance.

Very truly yours,

Keith Babich

Associate Vice President, Financial Aid

973-546-0123 ext. 5737



CHRoos:
899 Gully Avenue
Chilfane, NJ 07011
973.546.0123 fax: 973.546.0017

Dover:
15 East Blackwell Street
Dover, NJ 07801
973.366.6700 fax: 973.366.6329

Dover Business College

Response to Program Review Report with Corrective Action Plan

OPE ID: 012346

PRCN: 201120227470

Finding 1: Program Not Offered as Approved – Total Program Hours Not Offered

Citation:

"An institution offering a program in credit hours is subject to a specific clock to credit hour conversion formulas, to determine the number of credit hours allowed for purposes of Title IV HEA Program Assistance. Prior to 7/1/11, this formula requires that a quarter hour must include at least 20 clock hours of instruction. A clock hour is a 50-60 minute class, (or lecture, recitation, faculty lab, shop training, etc.) in a 60 minute period. Dover's programs do not meet any exception to this conversion requirement. "

Noncompliance:

"The reviewers found that Dover did not always offer all hours of instruction as stated in catalogs and program approvals, which could then affect the number of credit hours offered in the students programs."

Required Action

"Dover must confirm the actual number of clock hours/ quarter credit hours offered in all of its programs for all Title IV recipients in the period covered by this Program Review, to confirm whether students received the appropriate of Title IV funds for the programs that were offered.

Dover must then recalculate students Title IV eligibility in all cases where they did not receive the specified number of hours in the programs, and report any resultant over awards, by Title IV Program."

Results:

Dover Business College has performed the required action. During this file review, Dover Business College reviewed schedules and calculated the delivered clock hours for all students enrolled during the 2009/2010 and 2010/2011 award years.

Dover Business College determined that in some cases total program hours were not offered as approved. Dover Business College determined the effect of the reduced number of program hours on students' eligibility for Title IV aid awarded and disbursed to students in this finding. Amounts paid in excess of allowable amounts were

identified for these students by reducing the aid for the program by the percentage of hours that were not offered to the students during the award years. These results are reported in the attached auditor confirmed results.

Corrective Action to ensure future compliance:

Dover Business College has instituted the following procedures:

1. Prior to each quarter, the Dover Business College Associate Vice President for Advisement and Student Records reviews the academic calendar and ensures that all courses are scheduled correctly to include all hours of instruction. This is done for each academic course and program to ensure that hours delivered to students equal those approved by Accreditation and published in the Dover Business College catalog.
2. Classes that are scheduled for college holidays are immediately rescheduled for "make-up" days, ensuring that students receive the correct number of hours of instruction.
3. Class hours that are canceled due to snow days or other weather related cancellations are immediately rescheduled for "make-up" days.

Staff trained:	Yes. Staff is trained to ensure compliance and to ensure that Total Program hours are delivered as approved.
Frequency:	Quarterly, upon scheduling for each quarters courses, action is taken to ensure correct contact hour delivery.
Reports Used:	Academic and college calendars.
Procedure Explanation:	Courses are scheduled to ensure all approved program hours are delivered. College calendar is reviewed and any missed classes are immediately scheduled for make-up days which are reflected on the student's schedule.

Finding 2: Late or Unmade Payments of Credit Balances to Student

The College concurs with the finding.

Citation:

"Whenever an institution disburses Title IV funds, by crediting a student's account and the total amount of all Title IV funds credited exceeds that amount of institutional charges, the institution must pay the resulting credit balance directly to the student or parent as soon as possible, but no later than 14 days after the balance occurred if the credit balance occurred after the first day of class of a payment period, or no later the 14 days after the first day of class of a payment period if the credit balance occurred on or before the first day of class for that payment period."

Non-Compliance:

"Dover failed to make timely payments of credit balances to students when the institution received Title IV funds in excess of their tuition and fee charges. Those students had not given permission to Dover to hold those funds on their accounts. Further, Title IV requirements prohibit using Title IV Funds for future or past payment periods, with the exception of balances of no more than \$200.

Required Action:

"Dover must review all accounts of students who attended between 7/1/2009 and 6/30/2011 to identify students whose accounts have credit balances that should have been paid. Any student whose balances should have been paid but were not, must be paid immediately. A listing of those students and the credit balance amounts issued must be provided with the response to this report. Further, Dover must provide this office with copies of the cancelled checks, front and back, representing those payments when they are received from the bank."

Results:

Dover Business College has performed a full file review of all students in attendance between 7/1/2009 and 6/30/2011. The full results and requested back-up documentation from this file review are attached to this response as "Finding #2 Back-up"

The full and complete file review conducted by Dover Business College has identified \$163,236.92 as the total amount of Title IV credit balances that should have been paid, but were not. These refunds have been generated and paid immediately. Dover Business College will provide the Department with the requested backup, as it becomes available.

Corrective Action:

Dover Business College has substantially changed its business practices related to calculating and issuing Title IV credit balances following the Program Review. Dover Business College believes this finding will not occur in the future due to new processes.

This error will not occur in the future because the College is instituting the following:

1. Students are offered the option of authorizing the College to keep credit balances on the student account until the end of the academic year or loan period.
2. PeopleSoft queries are now used to identify credit balances on an on-going weekly basis. If there is no authorization on file, the credit balance will be refunded to the student immediately by the Bursar via a paper check.

Staff trained: Yes. Staff has been trained to ensure timely resolution of credit balances.

Frequency: Weekly

Reports Used: Outstanding Credit Balance Report generated by the Bursar via PeopleSoft

Procedure Explanation: Students may complete a T IV authorization form, allowing the College to keep credit balances on the students account until the end of the academic year or loan period. On a weekly basis, the Bursar will review the Credit Balance report and if there is no authorization on file, the credit balance will be refunded to the student.

In cases where the authorization is no longer in effect, refunds will be issued immediately.

Procedure Explanation: Prior to FA packaging, a student selected for verification submits documentation to the Financial Aid department and the verification process is conducted. After completion by the Financial Aid associate, the file is given to a senior verifier for a second review.

Finding 4 Entrance/ Exit Counseling Not Documented/ Performed

The College concurs with the finding.

Citation:

"An institution is required to provide exit counseling to students who complete or otherwise withdraw from their program of study. An institution must ensure that entrance/exit counseling is conducted with each FFEL and Direct Subsidized Loan or Direct Unsubsidized Loan borrower and graduate or professional students Direct PLUS Loan Borrower either in person, by audiovisual presentation, interactive electronic means or by mailing written counseling materials to the student borrower at the student borrower's last known address within 30 days after learning that the student borrower has withdrawn from school."

Noncompliance:

"Dover failed to provide exit counseling for six students in the sample."

Required Action:

"Dover must perform the required loan exit counseling for these six identified students and submit proof with its response to this report."

Corrective Action:

Dover Business College has performed the required exit loan counseling for these six students. Certified Mail Receipts and a roster of these students are attached in Section "Finding #4 Back-up".

This error will not occur in the future because the College is instituting the following:

- 1 The College now conducts face to face exit interviews during the final week of class for all student borrowers scheduled to complete their program.
- 2 When a student ceases enrollment by dropping or withdrawing, the College immediately informs the student in person and/ or by mail of their requirement to complete an Exit Interview, either at the Financial Aid Office or by electronic means.

Staff trained: Yes. Staff has been trained to ensure compliance with exit interview procedure.

Frequency: Quarterly, upon each class completion and weekly upon each change of status report.

Reports Used: Graduation List and Change of Status report.

Procedure Explanation: Our Default Manger conducts face to face exit interviews during the final week of class for all student borrowers scheduled to Graduate.

If a student drops or withdraws, the College informs the student of their requirement to complete an Exit Interview with the Financial Aid Office. If a student ceases enrollment without official notification, Financial Aid receives the "Change of Status Form" indicating the students drop. The default manager sends the student a letter informing them of the requirement to complete the exit interview, along with instructions on how to complete it accurately.

Finding 5 Inadequate Federal Work Study Controls – Federal Work Study Job Descriptions

Citation:

"An institution participating in the FWS Program shall follow procedures established for documentation of work, earnings, and payroll transactions for that program. The institution must also establish and maintain program and fiscal records that include a certification by the student's supervisor, an official of the institution or off-campus agency, that each student has worked and earned the amount being paid. The certification must include or be supported by, for students paid on an hourly basis, a time record showing the hours each students worked in clock time sequence, or the total hours worked per day."

Noncompliance:

"Dover did not have job descriptions in place for any of its FWS recipients"

Required Action:

If a student is employed with an agency or organization that provides community service, the school should, as with any other FWS position, have a job description that includes the duties and the responsibilities. Each FWS position should have a job description that includes the following.

1. Name and address of the employer
2. The purpose of the students job
3. The students duties and responsibilities
4. The Job qualifications
5. The Jobs wage rate or range
6. The length of the students employment
7. The name of the students supervisor

In response to this finding the institution must submit job descriptions for the six students identified during the program review.

Corrective Action:

Dover Business College recognizes the importance of ensuring that all Federal Work Study positions have an appropriate Job Description

As per the Departments request, Dover Business College is submitting the job descriptions for students 18, 31, 32, 33, 34 and 35. The job descriptions for these students can be found in Exhibit "E".

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

Moving Forward, Dover Business College has substantially changed its hiring and on-boarding workflow for Federal Work Study Students.

Currently, all available Federal Work Study positions, including detailed Job Descriptions are posted on our openly available online Job Board by the Human Resources Department. Interested students browse open positions and view job descriptions prior to applying. Students may then choose to apply online via our Job Board.

These job descriptions include:

- The name and address of the employer.
- The purpose of the student's job.
- The student's duty and responsibility.
- The job qualifications.
- The job's wage rate
- The length of the student's employment
- The name of the student's supervisor

With these new procedures in place, we can ensure that this error will not occur in the future.

Staff trained: Yes. Staff has been trained to ensure compliance with Federal Work Study regulations.

Frequency: Detailed Job descriptions are created and posted online as jobs become available.

Reports Used: None

Procedure Explanation: A Federal Work Study position is posted on the Dover Business College Job Board when a job becomes available. This posting includes a detailed Job Description. Interested students browse open positions and view job descriptions prior to applying. Students may then choose to apply online via our Job Board.

Finding 6: Failure to Report Change/ Update Application – Financial Aid Administrator

The College concurs with the finding.

Citation:

"An institution must report to the secretary in a manner prescribed by the Secretary no later than 10 days after the change occurs, the individual the institution designates under 34 CFR 668.16(b)(1) as its Title IV HEA Program Administrator."

Noncompliance:

Dover failed to report a change in its financial aid administrator within the required time frame.

Required Action:

Dover updated its electronic application during the program review. Dover must provide assurances that procedures have been implemented to ensure timely reporting in the future.

Corrective Action:

Dover Business College updated the required information via the Electronic Application during the Fieldwork period of this Program Review. Dover Business College will continue to make timely updates via the E-App, as staffing changes occur.

Staff trained: The Associate Vice President of Financial Aid is responsible for updating the Electronic Application.

Frequency: As required.

Procedure Explanation: The Associate Vice President of Financial Aid will update Dover Business College's Electronic Application as required.

Sincerely Yours,

Keith Lyle Babich
Associate Vice President, Financial Aid

Dated:
8/16/2012

Estimated Loss Formula

8/29/2012

Enter Institution Name

Dover Business College

Select Institution Type

Proprietary 2 Yrs or Less

Select Type of Loan	Select Award Year	Enter Ineligible Loan Amount	Enter School CDR	Total Subsidy Costs	Estimated Loss Liability
1 DL Subsidized	2009-2010	\$ 1,068.85	15.40%	4.79%	\$ 51.16
2 DL Unsubsidized	2009-2010	\$ 924.99	15.40%	-17.60%	\$ -
3					
Finding 1 Sub-Total for AY 1					
		\$ 1,993.84			\$ 51.16

4 DL Subsidized	2010-2011	\$ 5,271.29	15.40%	12.61%	\$ 664.55
5 DL Unsubsidized	2010-2011	\$ 5,194.91	15.40%	-10.10%	\$ -
6					
Finding 1 Sub-Total for AY 2					
		\$ 10,466.20			\$ 664.55

7					
8					
9					
Description					
		\$ -			\$ -

10					
11					
12					
Description					
		\$ -			\$ -

Appendix [D] - Estimated Loss Formula

Original Ineligible Loan Liability

\$ 12,460.04

Total Estimated Loss

\$ 715.71

To calculate estimated loss for a given ineligible loan amount, that amount is multiplied by the total subsidy rates calculated for the ineligible loans. Consolidation Loans will be obtained in the future to prepay some of the ineligible loans; the amount of Consolidation Loans divided by the ineligible Stafford/PLUS loans equals the "Consolidation prepayment rate" (H) for those loans.

The Department's Budget Office calculates, on an annual basis, the rate per dollar of loan of default subsidies (DSRs) and all other subsidies (OSRs) (D & E) for Stafford and PLUS Loans, by cohort year, program, loan type, and risk group. (note that 2008-2010 FFEL loan costs are calculated only by cohort year).

	A	B	C	D	E	F	G	H	I	J
School	Sector	Ratio **	DSR ***	Adjusted DSR	OSR ***	Avg Cons Year	Cons Prepay %	Cons DSR ***	Cons OS ***	
1	15.40%	14.49%	1.06	7.67%	8.13%	-3.76%	2017	21.1%	2.99%	-1.02%
2	15.40%	14.49%	1.06	9.44%	10.01%	-27.55%	2017	17.0%	3.16%	-3.54%
3										

4	15.40%	14.49%	1.06	6.28%	6.66%	5.00%	2018	21.1%	3.19%	1.30%
5	15.40%	14.49%	1.06	8.76%	9.29%	-19.94%	2018	23.0%	3.39%	-1.02%
6										

7										
8										
9										

10										
11										
12										

Federal Student Aid (FSA) calculates the cohort default rates (CDRs) of the institution (A) and the average

Appendix E

Ineligible Disbursements (Non-Loan) - Cost of Funds and Administrative Cost AllowanceName of Institution: Dover Business College 2009-2010 Finding 1

No.	Description/Name	Ineligible Disbmt	Program	Disbursement Date	Return Paid Date	No. of Days	Imputed CVFR	Federal Share	To ED	To Inst Accounts
191		\$35.46	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 35.46	\$ 0.42	\$ -
193		\$84.03	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 84.03	\$ 0.99	\$ -
194		\$17.06	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 17.06	\$ 0.20	\$ -
196		\$99.11	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 99.11	\$ 1.17	\$ -
197		\$62.94	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 62.94	\$ 0.75	\$ -
198		\$99.11	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 99.11	\$ 1.17	\$ -
199		\$13.26	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 13.26	\$ 0.16	\$ -
200		\$7.28	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 7.28	\$ 0.09	\$ -
201		\$90.20	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 90.20	\$ 1.07	\$ -
202		\$99.76	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 99.76	\$ 1.18	\$ -
204		\$21.24	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 21.24	\$ 0.25	\$ -
207		\$9.17	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 9.17	\$ 0.11	\$ -
208		\$4.17	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 4.17	\$ 0.05	\$ -
209		\$24.78	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 24.78	\$ 0.29	\$ -
211		\$13.52	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 13.52	\$ 0.16	\$ -
212		\$37.21	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 37.21	\$ 0.44	\$ -
213		\$13.52	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 13.52	\$ 0.16	\$ -
214		\$49.56	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 49.56	\$ 0.59	\$ -
215		\$56.63	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 56.63	\$ 0.67	\$ -
216		\$228.31	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 228.31	\$ 2.70	\$ -
217		\$35.40	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 35.40	\$ 0.42	\$ -
218		\$22.22	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 22.22	\$ 0.26	\$ -
219		\$22.23	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 22.23	\$ 0.26	\$ -
220		\$58.91	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 58.91	\$ 0.70	\$ -
221		\$28.13	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 28.13	\$ 0.33	\$ -
222		\$44.60	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 44.60	\$ 0.53	\$ -
223		\$12.99	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 12.99	\$ 0.15	\$ -
224		\$35.14	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 35.14	\$ 0.42	\$ -
225		\$49.53	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 49.53	\$ 0.59	\$ -
227		\$114.36	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 114.36	\$ 1.35	\$ -
228		\$64.59	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 64.59	\$ 0.76	\$ -
230		\$6.08	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 6.08	\$ 0.07	\$ -
231		\$33.38	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 33.38	\$ 0.40	\$ -

232		\$25.84	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	25.84	\$	0.31	\$	-
233		\$12.17	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	12.17	\$	0.14	\$	-
234		\$19.87	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	19.87	\$	0.24	\$	-
235		\$3.04	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	3.04	\$	0.04	\$	-
236		\$28.61	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	28.61	\$	0.34	\$	-
237		\$49.56	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	49.56	\$	0.59	\$	-
239		\$7.96	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	7.96	\$	0.09	\$	-
241		\$37.89	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	37.89	\$	0.45	\$	-
242		\$102.92	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	102.92	\$	1.22	\$	-
243		\$0.71	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	0.71	\$	0.01	\$	-
244		\$13.62	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	13.62	\$	0.16	\$	-
245		\$30.24	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	30.24	\$	0.36	\$	-
246		\$9.51	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	9.51	\$	0.11	\$	-
247		\$35.68	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	35.68	\$	0.42	\$	-
248		\$28.61	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	28.61	\$	0.34	\$	-
249		\$1.19	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	1.19	\$	0.01	\$	-
250		\$47.09	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	47.09	\$	0.56	\$	-
251		\$12.74	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	12.74	\$	0.15	\$	-
252		\$109.93	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	109.93	\$	1.30	\$	-
253		\$51.46	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	51.46	\$	0.61	\$	-
254		\$70.51	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	70.51	\$	0.83	\$	-
255		\$47.57	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	47.57	\$	0.56	\$	-
256		\$3.74	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	3.74	\$	0.04	\$	-
257		\$47.04	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	47.04	\$	0.56	\$	-
258		\$47.57	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	47.57	\$	0.56	\$	-
259		\$13.52	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	13.52	\$	0.16	\$	-
261		\$35.68	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	35.68	\$	0.42	\$	-

Total Ineligible

\$2,488.15

Totals

\$	29.44	\$	-
----	-------	----	---

Campus-Based Amounts Spent (from FISAP, Part VI, Section B)

Federal FWS

--

Federal SEOG

--

Federal Perkins

--

Total C-B Spent
ACA Percentage

\$	-
----	---

Interest Breakdown

Pell Grants

\$	29.44	\$	-
----	-------	----	---

ACG

\$	-	\$	-
----	---	----	---

SMART

\$	-	\$	-
----	---	----	---

TEACH

\$	-	\$	-
----	---	----	---

FWS

\$	-	\$	-
----	---	----	---

FSEOG

\$	-	\$	-
----	---	----	---

Perkins

\$	-	\$	-
----	---	----	---

FWS-50% Match

\$	-	\$	-
----	---	----	---

Ineligible Disbursements (Non-Loan) - Cost of Funds and Administrative Cost Allowance

Name of Institution: Dover Business College 2010-2011 Finding 1

No.	Description/Name	Ineligible Disbrsmnt	Program	Disburseme nt Date	Return Paid Date	No of Days	Imputed CVFR	Federal Share	To ED	To Inst Accounts
2		\$12.70	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 12.70	\$ 0.15	\$ -
3		\$38.54	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 38.54	\$ 0.46	\$ -
4		\$53.98	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 53.98	\$ 0.64	\$ -
5		\$21.45	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 21.45	\$ 0.25	\$ -
6		\$38.58	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 38.58	\$ 0.46	\$ -
7		\$250.61	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 250.61	\$ 2.97	\$ -
8		\$41.51	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 41.51	\$ 0.49	\$ -
9		\$64.29	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 64.29	\$ 0.76	\$ -
10		\$71.15	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 71.15	\$ 0.84	\$ -
12		\$53.37	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 53.37	\$ 0.63	\$ -
13		\$59.54	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 59.54	\$ 0.70	\$ -
14		\$66.07	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 66.07	\$ 0.78	\$ -
15		\$60.33	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 60.33	\$ 0.71	\$ -
16		\$12.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 12.00	\$ 0.14	\$ -
17		\$3.90	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 3.90	\$ 0.05	\$ -
18		\$37.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 37.00	\$ 0.44	\$ -
19		\$62.43	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 62.43	\$ 0.74	\$ -
20		\$3.21	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 3.21	\$ 0.04	\$ -
21		\$55.21	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 55.21	\$ 0.65	\$ -
22		\$21.32	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 21.32	\$ 0.25	\$ -
23		\$56.72	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 56.72	\$ 0.67	\$ -
25		\$28.55	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 28.55	\$ 0.34	\$ -
26		\$110.12	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 110.12	\$ 1.30	\$ -
27		\$205.56	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 205.56	\$ 2.43	\$ -
28		\$8.73	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 8.73	\$ 0.10	\$ -
29		\$41.27	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 41.27	\$ 0.49	\$ -
31		\$74.33	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 74.33	\$ 0.88	\$ -
32		\$46.60	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 46.60	\$ 0.55	\$ -
33		\$6.42	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 6.42	\$ 0.08	\$ -
34		\$90.35	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 90.35	\$ 1.07	\$ -
35		\$6.42	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 6.42	\$ 0.08	\$ -
36		\$103.12	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 103.12	\$ 1.22	\$ -
37		\$56.72	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 56.72	\$ 0.67	\$ -

38	\$125.44	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	125.44	\$	1.48	\$	-
39	\$218.40	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	218.40	\$	2.59	\$	-
40	\$54.15	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	54.15	\$	0.64	\$	-
43	\$7.67	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	7.67	\$	0.09	\$	-
44	\$51.39	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	51.39	\$	0.61	\$	-
45	\$66.07	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	66.07	\$	0.78	\$	-
46	\$14.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	14.00	\$	0.17	\$	-
47	\$27.86	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	27.86	\$	0.33	\$	-
48	\$218.40	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	218.40	\$	2.59	\$	-
49	\$218.40	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	218.40	\$	2.59	\$	-
50	\$218.40	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	218.40	\$	2.59	\$	-
53	\$24.46	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	24.46	\$	0.29	\$	-
54	\$109.20	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	109.20	\$	1.29	\$	-
55	\$37.36	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	37.36	\$	0.44	\$	-
57	\$167.01	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	167.01	\$	1.98	\$	-
58	\$56.72	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	56.72	\$	0.67	\$	-
59	\$23.82	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	23.82	\$	0.28	\$	-
60	\$22.93	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	22.93	\$	0.27	\$	-
61	\$130.12	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	130.12	\$	1.54	\$	-
63	\$6.42	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	6.42	\$	0.08	\$	-
64	\$30.66	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	30.66	\$	0.36	\$	-
65	\$31.13	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	31.13	\$	0.37	\$	-
67	\$28.61	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	28.61	\$	0.34	\$	-
68	\$6.42	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	6.42	\$	0.08	\$	-
69	\$18.58	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	18.58	\$	0.22	\$	-
72	\$21.46	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	21.46	\$	0.25	\$	-
74	\$98.22	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	98.22	\$	1.16	\$	-
76	\$56.72	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	56.72	\$	0.67	\$	-
77	\$41.51	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	41.51	\$	0.49	\$	-
78	\$167.01	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	167.01	\$	1.98	\$	-
79	\$167.01	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	167.01	\$	1.98	\$	-
80	\$167.01	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	167.01	\$	1.98	\$	-
81	\$44.66	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	44.66	\$	0.53	\$	-
82	\$244.10	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	244.10	\$	2.89	\$	-
83	\$34.59	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	34.59	\$	0.41	\$	-
84	\$51.71	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	51.71	\$	0.61	\$	-
85	\$46.60	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	46.60	\$	0.55	\$	-
86	\$167.01	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	167.01	\$	1.98	\$	-
87	\$92.47	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	92.47	\$	1.09	\$	-
88	167.01	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	167.01	\$	1.98	\$	-

89		\$14.82	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	14.82	\$	0.18	\$	-
91		\$185.34	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	185.34	\$	2.19	\$	-
92		\$87.26	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	87.26	\$	1.03	\$	-
93		\$167.01	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	167.01	\$	1.98	\$	-
94		\$167.01	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	167.01	\$	1.98	\$	-
95		\$48.74	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	48.74	\$	0.58	\$	-
96		\$36.10	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	36.10	\$	0.43	\$	-
97		\$160.33	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	160.33	\$	1.90	\$	-
98		\$160.33	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	160.33	\$	1.90	\$	-
99		\$167.01	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	167.01	\$	1.98	\$	-
100		\$44.06	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	44.06	\$	0.52	\$	-
101		\$36.94	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	36.94	\$	0.44	\$	-
103		\$44.66	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	44.66	\$	0.53	\$	-
104		\$33.51	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	33.51	\$	0.40	\$	-
108		\$3.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	3.00	\$	0.04	\$	-
109		\$167.01	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	167.01	\$	1.98	\$	-
110		\$14.82	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	14.82	\$	0.18	\$	-
111		\$141.32	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	141.32	\$	1.67	\$	-
112		\$14.82	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	14.82	\$	0.18	\$	-
113		\$29.36	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	29.36	\$	0.35	\$	-
114		\$22.38	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	22.38	\$	0.26	\$	-
115		\$23.12	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	23.12	\$	0.27	\$	-
116		\$4.65	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	4.65	\$	0.06	\$	-
117		\$167.01	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	167.01	\$	1.98	\$	-
118		\$44.24	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	44.24	\$	0.52	\$	-
119		\$6.29	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	6.29	\$	0.07	\$	-
121		\$33.83	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	33.83	\$	0.40	\$	-
122		\$25.72	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	25.72	\$	0.30	\$	-
124		\$37.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	37.00	\$	0.44	\$	-
125		\$32.12	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	32.12	\$	0.38	\$	-
126		\$34.63	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	34.63	\$	0.41	\$	-
128		\$18.90	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	18.90	\$	0.22	\$	-
129		\$41.69	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	41.69	\$	0.49	\$	-
130		\$19.33	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	19.33	\$	0.23	\$	-
131		\$44.52	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	44.52	\$	0.53	\$	-
132		\$47.44	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	47.44	\$	0.56	\$	-
133		\$31.82	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	31.82	\$	0.38	\$	-
134		\$32.27	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	32.27	\$	0.38	\$	-
137		\$37.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	37.00	\$	0.44	\$	-
138		\$30.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	30.00	\$	0.36	\$	-

139	\$58.73	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	58.73	\$	0.70	\$	-
140	\$42.05	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	42.05	\$	0.50	\$	-
141	\$28.90	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	28.90	\$	0.34	\$	-
142	\$37.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	37.00	\$	0.44	\$	-
143	\$41.51	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	41.51	\$	0.49	\$	-
144	\$12.43	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	12.43	\$	0.15	\$	-
145	\$42.05	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	42.05	\$	0.50	\$	-
146	\$8.67	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	8.67	\$	0.10	\$	-
147	\$7.46	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	7.46	\$	0.09	\$	-
149	\$7.46	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	7.46	\$	0.09	\$	-
150	\$7.46	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	7.46	\$	0.09	\$	-
152	\$119.40	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	119.40	\$	1.41	\$	-
153	\$4.03	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	4.03	\$	0.05	\$	-
154	\$115.75	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	115.75	\$	1.37	\$	-
155	\$56.72	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	56.72	\$	0.67	\$	-
156	\$41.51	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	41.51	\$	0.49	\$	-
157	\$20.51	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	20.51	\$	0.24	\$	-
158	\$61.21	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	61.21	\$	0.72	\$	-
159	\$918.49	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	918.49	\$	10.87	\$	-
161	\$37.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$	37.00	\$	0.44	\$	-

Total Ineligible

\$9,468.56

Totals

\$ 112.12 \$ -

Campus-Based Amounts Spent (from FISAP, Part VI, Section B)

Federal FWS
Federal FSEOG
Federal Perkins

Interest Breakdown
ACA Liability

\$ 112.12	\$ -
-----------	------

Total C-B Spent
ACA Percentage

\$ -

Pell
ACG
SMART
TEACH
FWS
FSEOG

Total	Federal Share
\$ 9,468.56	\$ 9,468.56
\$ -	\$ -
\$ -	\$ -
\$ -	\$ -
\$ -	\$ -
\$ -	\$ -

Pell Grants
ACG
SMART
TEACH
FWS
FSEOG
Perkins
FWS-50% Match
FWS-No Match
FSEOG-No Match
Perkins-No Match
ACA Breakdown

\$ 112.12	\$ -
\$ -	\$ -
\$ -	\$ -
\$ -	\$ -
\$ -	\$ -
\$ -	\$ -
\$ -	\$ -
\$ -	\$ -
\$ -	\$ -
\$ -	\$ -
\$ -	\$ -
\$ -	\$ -

FWS
FSEOG

Perkins	\$	-	\$	-
FWS-50% Match	\$	-	\$	-
FWS-No Match	\$	-	\$	-
FSEOG-No Match	\$	-	\$	-
Perkins-No Match	\$	-	\$	-

Total Campus-Based

\$	-	\$	-
----	---	----	---

Perkins	
FWS-50% Match	
FWS-No Match	
FSEOG-No Match	
Perkins-No Match	

Ineligible Disbursements (Non-Loan) - Cost of Funds and Administrative Cost Allowance

Name of Institution: Dover Business College 2010-2011 Finding 3

No.	Description/Name	Ineligible Disbrsmnt	Program	Disburseme nt Date	Return Paid Date	No. of Days	Imputed CVFR	Federal Share	To ED	To Inst Accounts
5		\$540.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 540.00	\$ 6.39	\$ -
153		\$250.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 250.00	\$ 2.96	
162		\$901.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 901.00	\$ 10.66	
163		\$101.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 101.00	\$ 1.20	\$ -
164		\$454.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 454.00	\$ 5.37	\$ -
165		\$226.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 226.00	\$ 2.68	\$ -
166		\$400.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 400.00	\$ 4.73	\$ -
167		\$797.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 797.00	\$ 9.43	\$ -
168		\$84.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 84.00	\$ 0.99	\$ -
169		\$59.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 59.00	\$ 0.70	\$ -
170		\$577.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 577.00	\$ 6.83	\$ -
171		\$1,600.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 1,600.00	\$ 18.94	\$ -
172		\$200.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 200.00	\$ 2.37	\$ -
173		\$3,500.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 3,500.00	\$ 41.43	\$ -
174		\$100.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 100.00	\$ 1.18	\$ -
175		\$33.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 33.00	\$ 0.39	\$ -
176		\$799.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 799.00	\$ 9.46	\$ -
177		\$200.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 200.00	\$ 2.37	\$ -
178		\$300.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 300.00	\$ 3.55	\$ -
179		\$225.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 225.00	\$ 2.66	\$ -
180		\$100.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 100.00	\$ 1.18	\$ -
181		\$56.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 56.00	\$ 0.66	\$ -
182		\$18.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 18.00	\$ 0.21	\$ -
183		\$34.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 34.00	\$ 0.40	\$ -
184		\$397.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 397.00	\$ 4.70	\$ -
185		\$291.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 291.00	\$ 3.44	\$ -
186		\$533.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 533.00	\$ 6.31	\$ -
187		\$101.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 101.00	\$ 1.20	\$ -
188		\$59.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 59.00	\$ 0.70	\$ -
189		\$1,100.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 1,100.00	\$ 13.02	\$ -
190		\$184.00	Pell Grant	6/30/2011	9/4/2012	432	1.00%	\$ 184.00	\$ 2.18	\$ -

Total Ineligible \$14,219.00

Campus-Based Amounts Spent (from FISAP, Part VI, Section B)

Federal FWS	
Federal SEOG	
Federal Perkins	

Total C-B Spent	\$ -
ACA Percentage	

	Total	Federal Share
Pell	\$ 14,219.00	\$ 14,219.00
ACG	\$ -	\$ -
SMART	\$ -	\$ -
TEACH	\$ -	\$ -
FWS	\$ -	\$ -
FSEOG	\$ -	\$ -
Perkins	\$ -	\$ -
FWS-50% Match	\$ -	\$ -
FWS-No Match	\$ -	\$ -
FSEOG-No Match	\$ -	\$ -
Perkins-No Match	\$ -	\$ -

Total Campus-Based	\$ -	\$ -
--------------------	--	--

Totals	\$ 168.29	\$ -
ACA Liability		

Interest Breakdown

Pell Grants	\$ 168.29	\$ -
ACG	\$ -	\$ -
SMART	\$ -	\$ -
TEACH	\$ -	\$ -
FWS	\$ -	\$ -
FSEOG	\$ -	\$ -
Perkins	\$ -	\$ -
FWS-50% Match	\$ -	\$ -
FWS-No Match	\$ -	\$ -
FSEOG-No Match	\$ -	\$ -
Perkins-No Match	\$ -	\$ -

ACA Breakdown

FWS	
FSEOG	
Perkins	
FWS-50% Match	
FWS-No Match	
FSEOG-No Match	
Perkins-No Match	

Prepared for
Dover Business College



START HERE
GO FURTHER
FEDERAL STUDENT AID

OPE ID 012346
PRCN 201120227470

Prepared by
U.S. Department of Education
Federal Student Aid
School Participation Team – NY/Boston

Program Review Report

Table of Contents

	Page
A. Institutional Information.....	2
B. Scope of Review.....	3
C. Findings	3
Finding 1 Program Not Offered as Approved – Improper Accounting of Clock Hours.....	3
Finding 2 Credit Balances.....	9
Finding 3 Incomplete Verification.....	10
Finding 4 Exit Counseling Not Documented/Performed.....	12
Finding 5 Written Policies and Procedures Missing/Inadequate – FWS Job Descriptions.....	12
Finding 6 Reporting Requirements - School Failed to Update EAPP.....	13
 <i>Appendix A: Student Sample</i>	 <i>14</i>

A. Institutional Information

Dover Business College
600 Getty Ave
Clifton, NJ 07011

Type: Proprietary

Highest Level of Offering: Non-Degree 1 Year (900-1799 hours)

Accrediting Agency: Accrediting Council for Independent Colleges and Schools (ACICS)

Current Student Enrollment: 671 (2010)

% of Students Receiving Title IV: 90% (2010)

Title IV Participation - source: Postsecondary Education Participants System (PEPS):

	<u>2009-2010</u>
Federal Pell Grant (Pell Grant)	\$3,809,591
Federal Family Educational Loan (FFEL)	\$13,095
Federal Direct Loan (DL)	\$7,285,844

Title IV Participation – source: Common Origination and Disbursement (COD)

	<u>2010-2011</u>
Federal Pell Grant (Pell Grant)	\$4,800,698
Federal Direct Loan (DL)	\$9,781,639

Default Rate FFEL/DL:	2008	16.7%
	2007	13.5%
	2006	11.6%

B. Scope of Review

- The U.S. Department of Education (the Department) conducted a program review at Dover Business College (Dover) from March 21, 2011 to March 30, 2011. The review was conducted by Teresa Martinez, Brenee Johnson and Ebony Foy.

The focus of the review was to determine Dover's compliance with the statutes and federal regulations as they pertain to the institution's administration of Title IV programs. The review consisted of, but was not limited to, an examination of Dover's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files was identified for review from the 2009/2010 and 2010/2011 award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. An additional 21 files were selected for further review of Dover's administration of the Title IV programs. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning Dover's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve Dover of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination letter.

C. Findings

During the review, several areas of noncompliance were noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by Dover to bring operations of the financial aid programs into compliance with the statutes and regulations.

1. Program Not Offered as Approved – Total Program Hours Not Offered

Citation: An institution offering programs in credit hours is subject to a specific clock to credit hour conversion formula to determine the number of credit hours allowed for purposes of Title IV HEA program assistance. Prior to 7/1/11, this formula requires that a quarter hour must

include at least 20 clock hours of instruction. A clock hour is a 50- to 60-minute class, (or lecture, recitation, faculty supervised laboratory, shop training, etc.) in a 60-minute period. Dover's programs do not meet any exception to this conversion requirement. 34 C.F.R. §600.2; 34 C.F.R. §668.8 (k) and (l); 34 C.F.R. §668.9.

34 CFR § 690.63(b) specifies that the Pell Grant calculation for a payment period for a student in a program using credit hours with standard terms requires prorations of the award for each payment period. The calculation for the payment period prorates a student's scheduled award based on enrollment status and then determining his or her annual award from the payment schedule for full time students or the disbursement schedule for three-quarter time, half time, or less-than half-time students.

Noncompliance: The reviewers found that Dover did not always offer all hours of instruction as stated in catalogs and program approvals, which could then affect the number of credit hours offered in the students' programs. The following are some examples of shortened program hours offered:

Student 2 enrolled in the Medical Assistant program, which started on 7/06/09. According to her enrollment agreement that program offered a total of 1144 clock hours/56 quarter credit hours over 48 weeks. Dover's accreditor and state licensing agency approve the program for 1144 clock hours/56 quarter credit hours. Dover's catalog describes this program as containing 57 quarter credit hours and 1144 clock hours.

A review of the official class schedule, transcript and the actual attendance records show that Dover did not offer all the specified hours of instruction. The official class schedule and attendance records confirmed that classes ended on 6/23/10, offering a total of 47 weeks, excluding the week at Christmas when no classes were held. However, there were five holidays that fell in that period; Labor Day, Thanksgiving, Martin Luther King Day, President's Day and Memorial Day. A review of the official class schedule, and the actual attendance records do not show that any additional classes were offered to offset these holidays. Additionally, a detailed review of the official class schedule and the attendance records confirms the student was offered 903 hours of classroom instruction for the Medical Assistant program instead of the 1144 hours specified in the school's catalog and approvals.

Summer 2009 Qtr.

7/6/09 – 9/18/09

11 Wks

Course	Quarter Credits	Required Credit Conversion	Documented Hours Offered Attendance	Transcript
CIS 101 - 7 Hrs per wk.	2	40 Clock Hrs	76	76
GEN 106 - 4 Hrs per wk.	4	80 Clock Hrs	44	44
GEN 131 - 6 Hrs per wk.	4	80 Clock Hrs	66	66
MED 101 - 3 Hrs per wk.	3	60 Clock Hrs	33	33

MED 108 - 4 Hrs per wk.	2	40 Clock Hrs	44	42
-------------------------	---	--------------	----	----

Fall 2009 Qtr.

9/28/09 – 12/18/09

12 Wks

GEN 132 - 6 Hrs per wk.	4	80 Clock Hrs	63	72
MED 102 - 3 Hrs per wk	3	60 Clock Hrs	36	36
MED 105 - 1 Hr per wk	1	20 Clock Hrs	13	12
MED 110 - 8 Hrs per wk	4	80 Clock Hrs	96	96
MED 115 - 4 Hrs per wk.	2	40 Clock Hrs	48	44
MED 120 - 2 Hrs per wk.	1	20 Clock Hrs	24	24

Winter 2010 Qtr.

1/4/10 – 3/26/10

12 Wks

BUS 190 - 1 Hr per wk	1	20 Clock Hrs	8	12
MED 125 - 3 Hrs per wk	2	40 Clock Hrs	36	36
MED 130 - 4 Hrs per wk.	2	40 Clock Hrs	46	48
MED 132 - 4 Hrs per wk.	2	40 Clock Hrs	44	40
MED 134 - 1 Hr per wk.	1	20 Clock Hrs	16	16
MED 142 - 8 Hrs per wk	6	120 Clock Hrs	96	96
MED 146 - 2 Hrs per wk.	1	20 Clock Hrs	22	24

Spring 2010 Qtr.

4/5/10 – 6/26/10

12 Wks

GEN 111 - 4 Hrs per wk.	3	60 Clock Hrs	48	48
MED 191 - 4 Hrs per wk.	5	100 Clock Hrs	44	48

Total	53	1060	903	913
--------------	-----------	-------------	------------	------------

Based on the school catalog, it appears that Dover intended to offer a 1144 hour program but instead offered only 903 hours. The number of clock hours offered within the specific classes varied between what was actually offered per the attendance records and the student's official class schedule. In addition, Dover did not offer the Psychology course (GEN 110) as listed in the catalog. Adding the 4 scheduled credit hours, the total number of credit hours offered would be 57, instead of 53. In addition, since the number of clock hours in the program was not properly calculated, the number of credit hours calculated are fewer than the number of credit hours approved for the program on the ECAR. In the case of **student no. 2**, after applying the clock-to-credit hour

conversion formula to **903** hours, the result is **45** quarter credit hours allowed for purposes of Title IV HEA program assistance. Therefore, Dover only offered 84% of the Medical Assistant program (45 quarter credit hours/53 quarter credit hours).

Similarly, **student 18** enrolled in the Surgical Technologist program, which started on 7/06/09. According to the school catalog, that program offered a total of 1428 clock hours/71 quarter credit hours. Dover's accreditor and state licensing agency approve the program for 1428 clock hours/70 quarter credit hours.

Summer 2009 Qtr.

7/6/09 – 9/18/09

11 Wks

<u>Course</u>	<u>Credits</u>	<u>Required Clock Credit</u>		
		<u>Conversion</u>	<u>Attendance</u>	<u>Transcript</u>
GEN 106 - 4 Hrs per wk.	4	80 Clock Hrs	44	44
GEN 131 - 6 Hrs per wk.	4	80 Clock Hrs	66	66
GEN 146 - 3 Hrs per wk.	3	60 Clock Hrs	30	30
MED 101 - 3 Hrs per wk.	3	60 Clock Hrs	33	33
SUR 100 - 2 Hrs per wk.	3	60 Clock Hrs	24	22

Fall 2009 Qtr.

9/28/09 – 12/18/09

12 Wks

GEN 132 - 6 Hrs per wk.	4	80 Clock Hrs	66	72
MED 102 - 3 Hrs per wk	3	60 Clock Hrs	21	36
SUR 110 – 1 Hr per wk	2	40 Clock Hrs	12	12
SUR 112 – 3 Hrs per wk	3	60 Clock Hrs	36	36
SUR 115 - 6 Hrs per wk.	3	60 Clock Hrs	66	72

Winter 2010 Qtr.

1/4/10 3/26/10

12 Wks

BUS 190 - 1 Hr per wk	1	20 Clock Hrs	12	12
CIS 102 - 4 Hrs per wk	1	20 Clock Hrs	46	44
GEN 133 - 3 Hrs per wk.	3	60 Clock Hrs	33	36
GEN 142 - 2 Hrs per wk.	2	40 Clock Hrs	20	20
MED 105 – 1 Hr per wk.	1	20 Clock Hrs	10	12
SUR 120 - 3 Hrs per wk	3	60 Clock Hrs	36	30
SUR 125 - 6 Hrs per wk.	3	60 Clock Hrs	72	72

Summer 2010 Qtr.

7/6/10 – 9/18/10
11 Wks

SUR 220 - 3 Hrs per wk	3	60 Clock Hrs	27	30
SUR 281 - 3 Hrs per wk	1	20 Clock Hrs	30	30

FALL 2010 Qtr.
9/27/10 – 12/18/10
12 Wks

GEN 110 – 4 Hrs per wk	4	80 Clock Hrs	48	48
SUR 291 - 3 Hrs per wk	1	20 Clock Hrs	48	72

Clinical Practicum I & II (SUR 280 & SUR 290)	16	320 Clock Hrs	320	320
--	----	---------------	-----	-----

Total	71	1420	1103	1152
--------------	-----------	-------------	-------------	-------------

Including the 320 scheduled clinical hours, the total number of program hours offered is 1103, instead of 1428. Based on the school catalog, it appears that Dover intended to offer a 1428 hour program but instead offered only 1103 hours. The number of clock hours offered within the specific classes varied between what was actually offered per the attendance records and the student's official class schedule. In addition, since the number of clock hours in the program was not properly calculated, the number of credit hours that result are fewer than the number of credit hours approved for the program on the ECAR. In the case of **student no. 18**, after applying the clock-to-credit hour conversion formula to **1103** hours, the result is **55** quarter credit hours allowed for purposes of Title IV HEA program assistance. Therefore, Dover only offered 71% of the Surgical Technologist program (55 quarter credit hours/77 quarter credit hours).

Additional students who graduated from Dover's programs with less than the approved number of class hours offered were as follows:

Student #	Program	Required Qtr. Credit Hours	Offered Qtr. Credit Hours	% of Program Offered
1	Patient Care	37	29	78
2	Medical Assistant	57	45	78
4	Medical Assistant	57	53	92
5	Patient Care	37	28	75
7	Surgical Processing Tech.	44	33	75
8	Medical Assistant	57	49	85
9	Medical Insurance & Coding	56	48	85
10	Surgical Technologist	71	39	54

of documents, liabilities paid, file reviews, projection sampling, and formulas used to calculate liabilities).

Instructions for the repayment of any liabilities will be provided in the Final Program Review Determination letter (FPRD).

The report is due within 60 days of receipt of this report.

2. Late or Unmade Payments of Credit Balances to Students

Citation: Whenever an institution disburses Title IV, HEA program funds by crediting a student's account and the total amount of all Title IV, HEA funds credited exceeds the amount of institutional charges, the institution must pay the resulting credit balance directly to the student or parent as soon as possible but no later than 14 days after the balance occurred if the credit balance occurred after the first day of class of a payment period, or no later than 14 days after the first day of class of a payment period if the credit balance occurred on or before the first day of class of that payment period. 34 C.F.R. §668.164 (c)(1)(2), 34 C.F.R. §668.164 (d)(2).

Noncompliance: Dover failed to make timely payments of credit balances to students when the institution received Title IV funds in excess of their tuition and fee charges. Those students had not given permission to Dover to hold those funds on their accounts. Further, Title IV requirements prohibit using Title IV funds for future or past payment periods, with the exception of balances of no more than \$200.

For example, **Student 2** received an Unsubsidized Direct Loan disbursement on September 29, 2009, which created a credit balance of \$22.00, which was then due the student no later than October 13, 2009. There was no indication on the student's account record that the credit balance had been paid. The student graduated on June 25, 2010.

Student 10 received a Subsidized Direct Loan disbursement on May 5, 2009, which created a credit balance of \$937.52. On May 6, 2009, the student received a Federal Pell Grant disbursement increasing the credit balance due the student to \$2,497. The credit balance was due the student no later than May 20, 2009. The credit balance was never delivered to the student but applied to the student's subsequent term tuition on July 27, 2009.

Student 15 received a Supplemental Educational Opportunity Grant disbursement on April, 21, 2010, which created a credit balance of \$417, due the student no later than May 5, 2010. The student received an additional Supplemental Educational Opportunity Grant disbursement on June 14, 2010 creating an additional credit balance of \$417. There was no indication on the student's account record that the credit balances had been paid. The student was dropped from the Medical Assistant program on 1/12/11.

Student 27 received Federal Pell Grant disbursements on February 16 and 17, 2010, which created a credit balance of \$379, due the student no later than March 3, 2010. There was no indication on the student's account record that the credit balance had been paid. The student graduated on December 17, 2010.

In addition, the following students also had credit balances at the time of the review: **Student 1, 4, 7, 11, 12, 13, 14, 22, 28, 47 and 50.**

Required Action: In response to this finding, Dover must review all accounts of students who attended between 7/1/09 through 6/30/11 to identify students whose accounts have credit balances that should have been paid. **Any students for whom credit balances should have been paid, but were not, must be paid immediately.** A listing of those students and the credit balance amounts issued must be provided with the response to this report. Further, Dover must provide this office with copies of the canceled checks, front and back, representing those payments when they are received from the bank.

Dover must develop procedures that will ensure the prompt delivery of credit balances to students in the future. Details of those procedures must be provided with the response to this report. The institution will be apprised of any additional requirements upon review of the response to this finding.

Instructions for the repayment of any liabilities will be provided in the Final Program Review Determination letter (FPRD).

The report is due within 60 days of receipt of this report.

3. Incomplete Verification

Citation: An institution is responsible for verifying all required information submitted by applicants for student financial assistance in connection with the calculation of their expected family contributions (EFC) for Title IV assistance. 34 C.F.R. §668.51(a),(b), 34 C.F.R. §668.56 (a) and C.F.R. 34 §668.57 (a),(b),(c),(d). An institution is responsible for updating information and resolving conflicting information under 34 C.F.R. §668.55(a)(1)(i)(ii) and using corrections to data originally reported to determine whether student eligibility would be impacted, 34 C.F.R. 668.59 (a),(b),(c),(d),(e). Title IV aid disbursements without complete or proper verification are institutional liabilities to the Federal aid programs.

Noncompliance: Dover did not accurately verify information from students who were selected for verification.

Student 12's application for financial aid was selected for verification in the 2009-2010 award year. The student's 2008 Income Tax Return was not signed.

Student 44's application for financial aid was selected for verification in the 2010-2011 award year. The number in college reported on the student's ISIR was two, however the verification worksheet only showed the student attending college. In addition, the student's 2009 Income Tax Return was not signed.

Student 46's application for financial aid was selected for verification in the 2010-2011 award year. The number in college reported on the student's ISIR was two, however the verification worksheet only showed the student attending college.

Student 49's application for financial aid was selected for verification in the 2010-2011 award year. The number in household reported on the student's ISIR was three, however the verification worksheet only showed the student as living in the household. In addition, a note in the student's file indicated that the student's children did not live with him.

Required Action: In response to this report, Dover must review the files of all Title IV recipients who were selected for verification in the 2010/2011 award years. The institution must collect any missing documentation and perform all required need analyses to confirm students' eligibility if information was revised as a result of verification. Dover is liable for the amounts of any awards in excess of students' revised need. Additionally, the institution is liable for all Title IV funds awarded in the applicable award year if the required documentation cannot be collected. Please note, in cases where information on verification worksheets is revised, the changes must be initialed and the worksheets must be signed again by the required persons.

In response to this finding, Dover must report the total amount of ineligible Title IV funds disbursed to students. All liabilities must be reported by award year, listing students in alphabetical order and spreadsheet format with the following column headings:

Award Year
Student's Name
Last four digits of the student's Social Security Number
Original Award (by Title IV Program)
Revised Award (by Title IV Program)
Difference (by Title IV Program)

The result of Dover's file review must be attested to by a Certified Public Accountant. We define auditor attestation as a confirmation statement that a corrective action was accurately taken by the Institution in accordance with the Department's instructions (which includes the confirmation of documents, liabilities paid, file reviews, projection sampling, and formulas used to calculate liabilities).

Instructions for the repayment of any liabilities will be provided in the Final Program Review Determination letter (FPRD).

The report is due within 60 days of receipt of this report.

4. Entrance/Exit Counseling Not Documented/Performed

Citation: An institution is required to provide exit counseling to students who complete or otherwise withdraw from their program of study. An institution must ensure that entrance/exit counseling is conducted with each FFEL and Direct Subsidized Loan or Direct Unsubsidized Loan borrower and graduate or professional student Direct PLUS Loan borrower either in person, by audiovisual presentation, interactive electronic means or by mailing written counseling materials to the student borrower at the student borrower's last known address within 30 days after learning that the student borrower has withdrawn from school. 34 C.F.R. §682.604(f), 34 C.F.R. §682.604(g), 34 C.F.R. §685.304(b)(1)(2)(3).

Noncompliance: Dover failed to provide exit counseling for **students 8, 12, 31, 32, 47 and 48.**

Required Action: Dover must perform the required exit loan counseling for **students 8, 12, 31, 32, 47, and 48** and submit proof with its response to this report. A certified mail receipt will be considered adequate documentation. Additionally, the institution must provide its assurances that entrance and exit loan counseling will be performed in a timely manner for all Direct Loan borrowers.

5. Inadequate FWS Controls – FWS Jobs Descriptions

Citation: An institution participating in the FWS Program shall follow procedures established in 34 C.F.R. §675.19 and 34 C.F.R. §675.21(b) for documentation of work, earnings, and payroll transactions for that program. The institution must also establish and maintain program and fiscal records that include a certification by the student's supervisor, an official of the institution or off-campus agency, that each student has worked and earned the amount being paid. The certification must include or be supported by, for students paid on an hourly basis, a time record showing the hours each student worked in clock time sequence, or the total hours worked per day. 2010-2011 Federal Student Aid Handbook, Volume 6, Chapter 2, Appendix B.

Noncompliance: Dover did not have job descriptions in place for any of its FWS recipients.

Required Action: If a student is employed with an agency or organization that

provides community service, the school should, as with any other FWS position, have a job description that includes the duties and the responsibilities. Each FWS position should have a job description that includes the following:

- the name and address of the student's employer (department, public agency, nonprofit organization),
- the purpose of the student's job,
- the student's duties and responsibilities,
- the job qualifications,
- the job's wage rate or range,
- the length of the student's employment (beginning and ending dates), and
- the name of the student's supervisor.

In response to this finding, the institution must submit FWS job descriptions for **students 18, 31, 32, 33, 34 and 35**. In addition, the institution must apprise this office of procedures it has implemented to address the issues noted above. Details of those procedures must be provided with the response to this report.

6. Failure to Report Change/Update Application – Financial Aid Administrator

Citation: An institution must report to the Secretary in a manner prescribed by the Secretary no later than 10 days after the change occurs, the individual the institution designates under 34 CFR 668.16(b)(1) as its Title IV, HEA Program administrator.

Noncompliance: Dover failed to report a change in its financial aid administrator within the required time frame.

Required Action: A school must notify the Department by reporting the change and the date of the change to the Department via the E-App within 10 calendar days of the change. Dover updated its electronic application during the program review. Dover must provide assurances that procedures have been implemented to ensure timely reporting in the future.

Appendix A – Student Sample

AWARD YEAR 2009-2010

No.	Last Name	First Name	SSN
------------	------------------	-------------------	------------

(b)(6); (b)(7)(C)			
-------------------	--	--	--

N